

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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MATTEL, INC., :

Plaintiff, :

- against - :

20 Civ.

THE ENTITIES DOING BUSINESS :

AS GOODMENOW AT THE URL :

GOODMENOW.COM, THE ENTITIES :

DOING BUSINESS AS :

MEETGOODTIMES AT THE URL :

MEETGOODTIMES.COM, :

THE ENTITIES DOING BUSINESS AS :

FEELITNICE AT THE URL :

FEELITNICE.COM, THE ENTITIES :

DOING BUSINESS AS THE PAYPAL :

MERCHANT YOKAWA NETWORK :

LIMITED, JOHN DOE NOS. 1-5, AND :

ABC ENTITY NOS. 1-5, :

Defendants. :

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DECLARATION OF EMILY H. JAQUEZ IN SUPPORT OF PLAINTIFF'S  
MOTION FOR AN ORDER OF ATTACHMENT AND  
A TEMPORARY RESTRAINING ORDER

EMILY H. JAQUEZ hereby declares pursuant to 28 U.S.C. § 1746 that the following is true and correct.

1. I am the office manager at Dunnegan & Scileppi LLC, attorneys for plaintiff Mattel, Inc. ("Mattel").

2. I am making this declaration in support of Mattel's application for an order (i) attaching the funds at PayPal, Inc. ("PayPal") of the entities doing business as GoodMeNow at the URL [www.goodmenow.com](http://www.goodmenow.com), the entities doing business as MeetGoodTimes at the

URL [www.meetgoodtimes.com](http://www.meetgoodtimes.com), the entities doing business as FeelItNice at the URL [www.FeelItNice.com](http://www.FeelItNice.com), the entities doing business as the PayPal Merchant Yokawa Network Limited (“Yokawa”) (collectively, “Defendants”), and (ii) temporarily restraining *ex parte* those funds at PayPal pending the hearing on the application for an order of attachment.

3. On November 2, 2020, I saw an advertisement on [www.facebook.com](http://www.facebook.com) which advertised two dolls for sale at [www.feelitnice.com](http://www.feelitnice.com). That advertisement displayed (i) the word “BARBIE” twice, and (ii) two images of “Day of the Dead” dolls, side by side, which I understand are reproductions of Mattel’s images. A copy of the advertisement on [www.facebook.com](http://www.facebook.com) is attached as Exhibit E.

4. That day, I purchased, using PayPal, the two dolls that were advertised on [www.feelitnice.com](http://www.feelitnice.com). Copies of the offering for those dolls on [www.feelitnice.com](http://www.feelitnice.com) are attached as Exhibit F. A copy of my e-mail confirmation from [www.feelitnice.com](http://www.feelitnice.com) is attached as Exhibit G. The sender of the email was [support@24dzservice.com](mailto:support@24dzservice.com), which was also the only contact information on the email or on the site. A copy of my confirmation from PayPal is attached as Exhibit H. The PayPal confirmation identified the seller as “Yokawa.”

5. I never received the product that I ordered, although the money was deducted from my account. The tracking information from the site stated that it was delivered.

6. On November 11, 2020, I visited the website [www.goodmenow.com](http://www.goodmenow.com). There, I saw the same two dolls being advertised for sale, using images of the same dolls. A copy of the advertisements for the two dolls are attached as Exhibit I.

7. Attached as Exhibit J are copies of certain pages from the “Privacy Policy,” “Refund Policy,” “Shipping Policy” and “Terms of Service” sections of this website. Other


than the e-mail address support@24dzservice.com, and the phone number “800 2345 6789” I was unable to find any identification information or contact information on this website.

8. On November 11, 2020, I also visited the website www.meetgoodtimes.com. There, I saw the same two dolls being advertised for sale, using the word “BARBIE,” and displaying the same dolls. Copies of the advertisements for the two dolls are attached as Exhibit K.

9. Attached as Exhibit L are copies of certain pages from the “Privacy Policy,” “Shipping & Delivery,” and “Terms of Service” sections of this website. Other than the e-mail address support@24dzservice.com, I was unable to find any identification information or contact information on the Website.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 30th day of December 2020.

  
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Emily H. Jaquez